

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IAN POLLARD, on behalf of himself,)	
and all others similarly situated,)	
)	
Plaintiff,)	
v.)	Case No.: 4:13-cv-00086-ODS
)	
)	
REMINGTON ARMS COMPANY, LLC.,)	
SPORTING GOODS PROPERTIES, INC.)	
and E.I. DU PONT NEUMOURS AND)	
COMPANY)	
Defendants.)	

JOINT NOTICE OF SETTLEMENT

Plaintiff Ian Pollard and Defendants Remington Arms Company, LLC.; Sporting Goods Properties, Inc.; and E.I. Du Pont de Nemours & Company hereby notify the Court that the parties have reached a nationwide class settlement of the claims alleged in both the Class Action Complaint (Doc. 1) and proposed First Amended Class Action Complaint. (Doc. 59-1.) The parties have finalized the material terms of the settlement and are in the process of executing a comprehensive settlement agreement concerning all of the class claims.

The parties shall prepare and execute a formal settlement agreement and submit to the Court a joint motion for preliminary settlement approval on or before October 30, 2014. Pursuant to the terms of the settlement agreement, Plaintiffs shall also prepare and file a proposed Second Amended Class Action Complaint on or before October 30, 2014 that encompasses the class(es) for which settlement relief extends. The parties jointly request that the Court take all other scheduled dates and deadlines off the Court's calendar. The parties will propose dates for a preliminary approval hearing, filing final approval papers, and a final approval hearing at the time of filing the settlement agreement and preliminary approval motion.

Dated: July 2, 2014

Respectfully submitted:

s/ Charles E. Schaffer

Charles E. Schaffer, *pro hac vice*
LEVIN, FISHBEIN, SEDRAN & BERMAN
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Phone: 215-592-1500
Fax: 215-592-4663
cschaffer@lfsblaw.com

Jordan L. Chaikin

PARKER WAICHMAN LLP
3301 Bonita Beach Road, Suite 101
Bonita Springs, FL 34134
Phone: (239) 390-1000
Fax: (239) 390-0055
jchaikin@yourlawyer.com

John R. Climaco

John A. Peca
CLIMACO, WILCOX, PECA, TARANTINO &
GAROFOLI CO., LPA
55 Public, Suite 1950
Cleveland, OH 44113
jrcлим@climacolaw.com
japeca@climacolaw.com

Richard Arsenault

NEBLETT, BEARD & ARSENAULT
2220 Bonaventure Court
Alexandria, LA 71301
Phone: 800-256-1050
rarsenault@nbalawfirm.com

Eric D. Holland

R. Seth Crompton
HOLLARD, GROVES, SCHNELLER & STOLZE, LLC
300 North Tucker Boulevard, Suite 801
St. Louis, MO 63101
Tel: (314) 241-8111
Fax: (314) 241-5554
eholland@allfela.com
scrompton@allfela.com

s/ John K. Sherk

John K. Sherk, MO Bar 35963
Amy M. Crouch, MO Bar 48654
SHOOK, HARDY & BACON LLP
2555 Grand Blvd.
Kansas City, MO 64108
Phone: 816-474-6550
Fax: 816-421-5547
jsherk@shb.com
amcrouch@shb.com

Dale G. Wills

SWANSON, MARTIN & BELL, LLP
330 North Wabash Avenue, Suite 3300
Chicago, Illinois 60611
Phone: (312) 321-9100
Fax: (312) 321-0990
dwills@smbtrials.com

Attorneys for Defendants

Jon D. Robinson
Christopher Ellis
BOLEN ROBINSON & ELLIS, LLP
202 South Franklin, 2nd Floor
Decatur, IL 62523
Phone: (217) 429-4296
Fax: (217) 329-0034
jrobinson@brelaw.com
cellis@brelaw.com

Richard Ramler
RAMLER LAW OFFICE, PC
202 W. Madison Avenue
Belgrade, MT 59714
richardramler@aol.com

Timothy W. Monsees
MONSEES & MAYER, PC
4717 Grand Avenue, Suite 820
Kansas City, MO 64112
tmonsees@mmmpalaw.com

W. Mark Lanier
LANIER LAW FIRM
6810 FM 1960 West
Houston, TX 77069
wml@lanierlawfirm.com

Lynn Lincoln Sarko, WSBA No. 16569
Mark A. Griffin, WSBA No. 16296
KELLER ROHRBACK LLP
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Phone: (206) 623-1900
Fax: (206) 623-3384
lsarko@kellerrohrback.com
mgriffin@kellerrohrback.com

Attorneys for Plaintiffs

***Filing Attorney hereby certifies that the other signatory to this document has expressly agreed to the form and substance of this document.**

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2014, I filed the foregoing with the clerk of the court using the court's CM/ECF system, which caused a copy of the foregoing document to be served upon all counsel of record via ECF Notice of Electronic Filing.

/s/ John K. Sherk